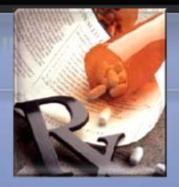


The United States Department of Justice

Drug Enforcement Administration



FDA Drug Safety and Risk Management Advisory Committee Concerning Hydrocodone Combination Products

U.S. Food and Drug Administration Rockville, Maryland January 24, 2013

Goals of this presentation

 Provide a background of the drug scheduling process

 Discuss hydrocodone diversion, trafficking and abuse from a law enforcement perspective

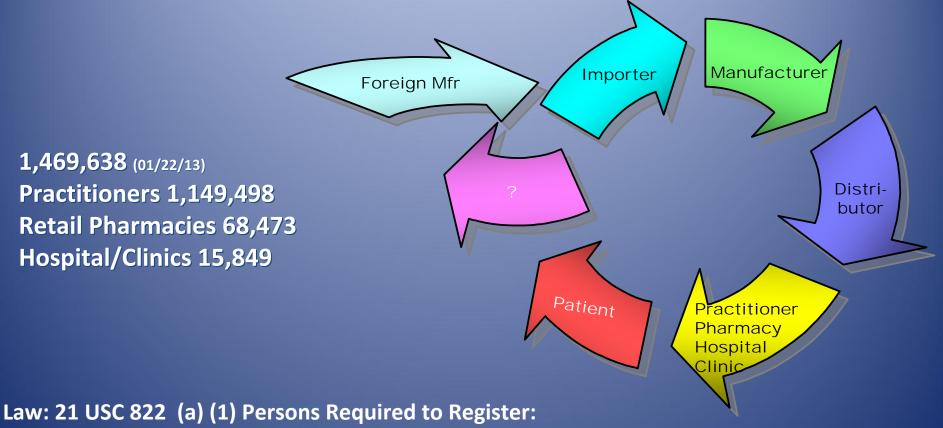
 Provide facts and identify fiction related to the consequences of rescheduling

Mission Statement of the DEA Office of Diversion Control

 To prevent, detect, and investigate the diversion of pharmaceutical controlled substances and listed chemicals from legitimate channels

 While ensuring an adequate and uninterrupted supply of controlled substances to meet legitimate medical, commercial, and scientific needs.

Closed System of Distribution



"Every person who manufactures or distributes any Controlled Substance or List I Chemical or who proposes to engage in .."

Law: 21 USC 822 (a) (2) Persons Required to Register:

"Every person who dispenses, or who proposes to dispense any controlled substance ..."



Closed System of Distribution



Procedures to control a substance

- DEA receives a petition from an interested party (proceedings may also be initiated at the request of the AG or Secretary of HHS)
- Petition is reviewed and accepted
- DEA conducts initial 8-factor analysis review
- Documents and material gathered during the initial review and analysis of petition is sent to HHS/FDA with a request for a scientific and medical evaluation and a recommendation as to whether the drug should be controlled
- The recommendation and review document is received back from HHS/FDA

Factors determinative of control or removal from schedules (21 USC 811(c))

- (1) Its actual or relative potential for abuse
- (2)Scientific evidence of its pharmacologic effect, if known
- (3)The state of current scientific knowledge regarding the drug or other substance
- (4) Its history and current pattern of abuse
- (5) The scope, duration and significance of abuse
- (6) What, if any, risk there is to public health
- (7) Its psychic or physiological dependence liability
- (8)Whether the substance is an immediate precursor of a substance already controlled under this subchapter

Schedule II

- The drug or other substance has a high potential for abuse
- The drug or other substance has a currently accepted medical use in treatment in the United States or a currently accepted medical use with severe restrictions
- Abuse of the drug or other substance may lead to severe psychological or physical dependence

Schedule III

- The drug or other substance has a potential for abuse less than the drugs or other substances in schedules I or II
- The drug or other substance has a currently accepted medical use in treatment in the United States
- Abuse of the drug or other substance may lead to moderate or low physical dependence or high psychological dependence

"Abuse" is not defined in the CSA

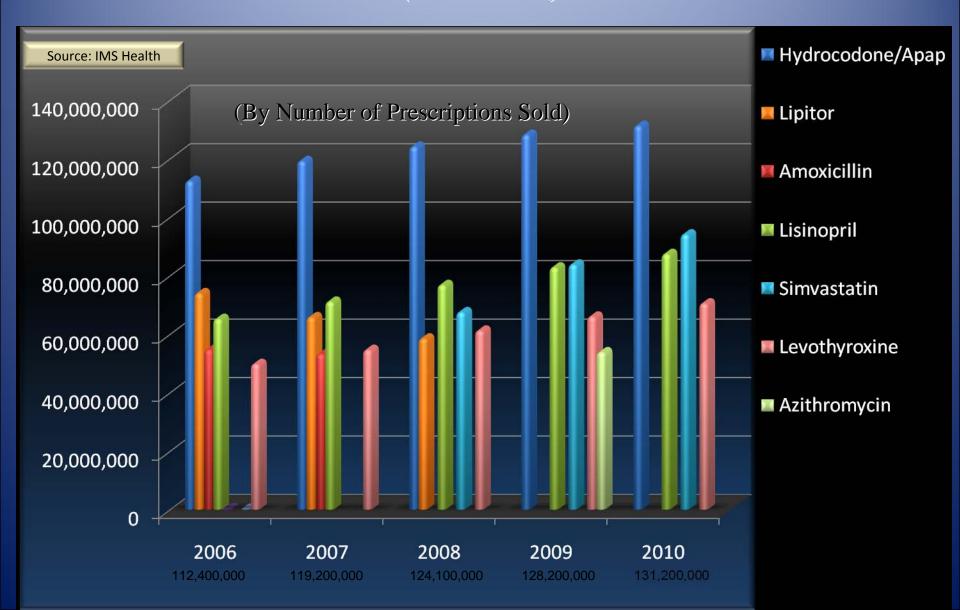
The legislative history suggests the following in determining whether a particular drug or substance has a potential for abuse(1):

- a. Individuals are taking the drug or other substance in amounts sufficient to create a hazard to their health or to the safety of other individuals or to the community; or
- b. There is a significant diversion of the drug or other substance from legitimate drug channels; or
- c. Individuals are taking the drug or other substance on their own initiative rather than on the basis of medical advice from a practitioner licensed by law to administer such drugs; or
- d. The drug is so related in its action to a drug or other substance already listed as having a potential for abuse to make it likely that it will have the same potential for abuse as such substance, thus making it reasonable to assume that there may be significant diversions from legitimate channels, significant use contrary to or without medical advice, or that it has substantial capability of creating hazards to the health of the user or to the safety of the community. Of course, evidence of actual abuse of a substance is indicative that a drug has potential for abuse

1. (Comprehensive Drug Abuse Prevention and Control Act of 1970, H.R. Rep. No 91-1444, 91st Cong., Sess.1 (1970) reprinted in U.S.C.C.A.N. 4566,4603):

Extent of Distribution

Top Five Prescription Drugs Sold in the U.S. (2006-2010)



Top 25 U.S. Pharmaceutical Products Dispensed by Prescription*

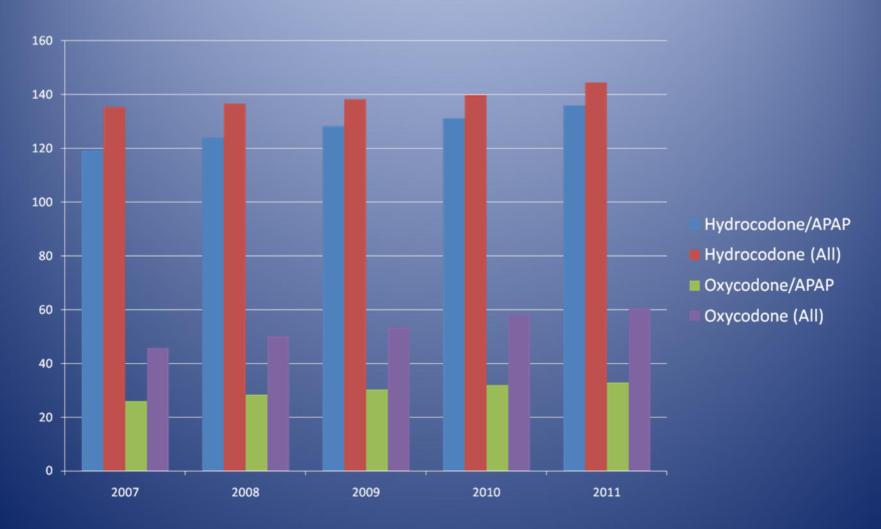
	了是是 AX II. 20 中间										
10000	CANADA CONTRACTOR OF THE PARTY	2007	2008	2009	2010	2011					
100	etal US Prescription Market	3,825	3,866	3,949	3,993	4,024					
1	hydrocodone/sectsminophen	119.2	124.1	128.2	131.2	136.0					
	zimvastatin	47.9	67.5	83.8	94.1	96.6					
2	lisinopril	71.1	76.8	82.8	87.4	88.6					
4	levothyroxine sodium	54.6	61.2	66.0	70.5	74.1					
5	amlodipine besylate	27.9	44.6	51.3	57.2	62.1					
6	omeprazole (RX)	26.6	35.1	45.4	53.4	59.3					
7	azithromycin	46.3	51.0	53.8	52.6	55.3					
- 8	a moxicillin	53.2	50.9	52.4	52.3	53.8					
-12	metformin HCL	40.2	42.3	44.3	46.9	48.4					
10	hydrochlorothiazide	48.5	48.5	47.9	47.8	48.1					
	alprarolam	39.8	41.7	43.9	46.3	47.8					
12	furosemide	44.2	44.1	43.5	43.4	42.1					
13	Lipitor®	65.8	58.5	51.7	45.3	40.8					
14	zolpidem tartrate	16.0	29.9	35.1	38.0	39.4					
15	metoprolol tartrate	31.6	32.6	41.1	38.9	37.8					
16	citalopram HBR	17.8	22.4	27.1	32.1	37.7					
17	acrtraline HCL	31.6	32.7	34.2	35.7	37.2					
18	metoprolol succinate	21.0	41.5	26.9	33.0	34.5					
19	prednisone	25.9	27.1	27.8	28.7	33.7					
20	stendol	44.7	41.8	39.3	36.3	33.3					
21	gabapentin	20.0	22.2	25.4	29.3	33.2					
22	tramadel HCL	19.1	21.8	24.1	26.8	32.9					
23	oxycodone/acetaminophen	25.9	28.4	30.2	31.9	32.8					
24	ibuprofe n (RX)	27.7	28.5	30.3	31.1	32.6					
25	warfarin sodium	28.8	30.2	31.6	32.0	30.9					





U.S. Dispensed Prescriptions

(Total RX's in Millions)



Source: IMS Health: National Prescription Audit

State Ranking* - Hydrocodone January 1- December 31, 2011

RANK	STATE	TOTAL	RANK	STATE	TOTAL	RANK	STATE	TOTAL	RANK	STATE	TOTAL	RANK	STATE	TOTAL
1	CA	26,596,905	12	MD	1,056,089	23	ОН	531,337	34	MN	214,474	45	MT	61,460
2	GA	3,650,814	13	VA	1,034,924	24	NJ	522,515	35	ND	186,249	46	SD	58,412
3	L	2,535,828	14	TX	1,002,407	25	CT	408,858	36	IA	164,389	47	ME	48,402
4	FL	2,448,494	15	KY	965,850	26	OR	382,882	37	DE	150,950	48	RI	29,827
5	NV	2,435,532	16	CO	940,617	27	WI	376,634	38	KS	139,620	49	DC	28,654
6	TN	2,429,834	17	NY	690,759	28	Ξ	376,252	39	KS	132,850	50	VT	26800
7	PA	1,837,008	18	SC	655,614	29	LA	371,093	40	UT	111,602	51	NH	22472
8	AL	1,454,378	19	MO	649,763	30	MI	366,637	41	WV	99,190	52	GU	6,200
9	IN	1,326,323	20	WA	596,102	31	ID	247,450	42	AR	97,303	53	RP	2,200
10	AZ	1,161,886	21	OK	594,602	32	AK	235,769	43	NE	78,756	54	VI	1,800
11	MI	1,062,674	22	NC	581,264	33	NM	226,786	44	WY	70,360			

^{*} Business Activity - Practitioners

State Ranking* - Hydrocodone January 1— September 30, 2012

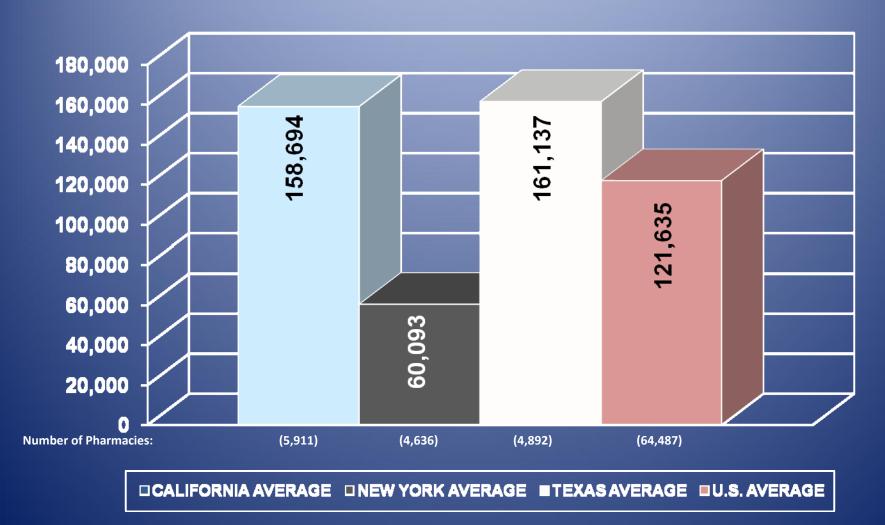
RANK	STATE	TOTAL	RANK	STATE	TOTAL	RANK	STATE	TOTAL	RANK	STATE	TOTAL	RANK	STATE	TOTAL
1	CA	23,776,920	12	MD	741,978	23	ОН	346,787	34	AK	159,271	45	NE	50,104
2	GA	2,409,068	13	TX	701,126	24	Н	345,827	35	MN	139,325	46	SD	42,280
3	IL	2,050,379	14	СО	620,493	25	MS	330,759	36	IA	112,594	47	ME	37,500
4	TN	1,647,726	15	NV	564,154	26	NJ	325,776	37	ND	106,930	48	RI	22,667
5	PA	1,646,148	16	NC	500,302	27	WA	310,658	38	KS	93,795	49	DC	21,110
6	AL	1,324,943	17	MO	493,318	28	WI	266,806	39	DE	85,458	50	VT	14,900
7	MI	883,366	18	NY	456,281	29	LA	244,062	40	UT	79,160	51	NH	11,818
8	IN	850,550	19	OK	408,606	30	OR	224,877	41	MA	69,290	52	GU	3,500
9	VA	812,750	20	KY	405,044	31	ID	176,600	42	WY	68,450	53	PR	2,500
10	AZ	806,259	21	SC	374,024	32	WV	167,788	43	AR	66,270	54	VI	700
11	FL	754,979	22	СТ	360,517	33	NM	161,810	44	MT	54,800	55	AS	0

^{*} Business Activity - Practitioners

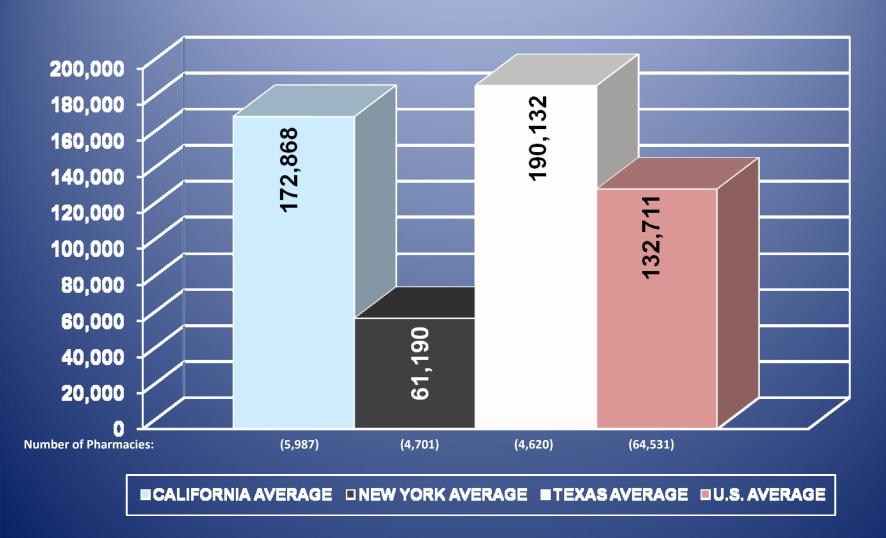
State Ranking* - Hydrocodone January 1 - September 30, 2012

RANK	STATE	TOTAL	RANK	STATE	TOTAL	RANK	STATE	TOTAL	RANK	STATE	TOTAL	RANK	STATE	TOTAL
1	CA	752,243,210	12	PA	179,880,349	23	MS	95,040,930	34	MA	45,146,650	45	NH	11,372,160
2	TX	616,744,356	13	KY	174,997,631	24	AR	91,577,120	35	MD	39,757,136	46	WY	9,801,690
3	TN	372,321,936	14	NC	168,721,190	25	OR	89,644,605	36	ID	39,144,850	47	AK	8,914,452
4	MI	316,860,884	15	MO	155,533,410	26	WI	83,864,540	37	NM	34,014,930	48	ND	8,192,140
5	FL	272,756,535	16	OK	142,561,470	27	KS	72,465,169	38	NE	28,350,230	49	DE	7,154,030
6	IL	233,059,530	17	LA	128,601,625	28	WV	68,151,620	39	СТ	26,188,240	50	VT	5,672,450
7	ОН	224,079,845	18	SC	119,274,940	29	СО	60,518,800	40	ME	22,443,390	51	DC	1,795,600
8	IN	216,475,192	19	NV	117,109,135	30	IA	53,580,034	41	MT	20,483,720	52	PR	1,421,520
9	GA	197,245,775	20	WA	113,082,770	31	MN	53,502,119	42	RI	15,836,670	53	VI	344,030
10	NY	191,672,460	21	VA	111,391,716	32	UT	46,820,190	43	НІ	14,422,340	54	GU	183,400
11	AL	190,924,530	22	AZ	108,617,660	33	NJ	46,479,750	44	SD	12,077,710	55	AS	0

^{*} Business Activity - Retail Pharmacies

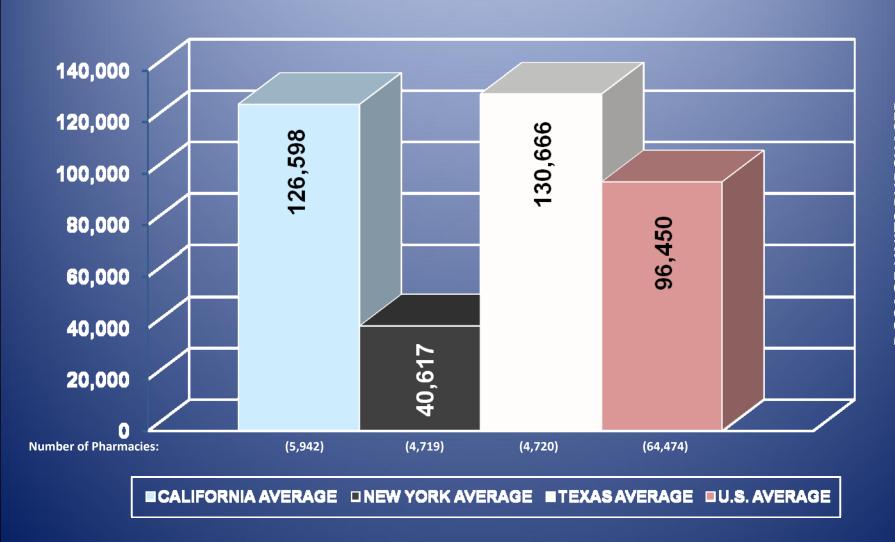


2011
Comparisons of Hydrocodone Sales to Pharmacies



DOSAGE UNITS PURCHASED

January 1 – September 30, 2012 Comparisons of Hydrocodone Sales to Pharmacies



Source: ARCOS
Date Prepared: 01/16/2013

Methods of Abuse

a. Individuals are taking hydrocodone combination products in amounts sufficient to create a hazard to their health or to the safety of other individuals or to the community.

Drug Abuse Warning Network (DAWN) data indicate that abuse of hydrocodone combination products has been associated with a large number of admissions to the emergency department (ED). The rates of ED mentions per each kg of the drug of hydrocodone (as bitartrate salt form) combination products distributed were largely similar (during 1998 through 2002) or slightly lower (during 2004 through 2010) than those for oxycodone (as hydrochloride salt form) products.

According to the Florida Department of Law Enforcement (FDLE), hydrocodone combination products have been associated with a large number of deaths in Florida in recent years. For example, in 2011, hydrocodone combination products were associated with 877 deaths, while oxycodone products were associated with 2,128. The rates of deaths (deaths per 100 kg of drug distributed in Florida) associated with hydrocodone (as bitartrate salt form) combination products were similar to (from 2005 through 2007) or slightly higher (from 2008 through 2011) than those for oxycodone (as hydrochloride salt form) products.

According to the American Association of Poison Control Centers' National Poison Data System (NPDS; formerly known as Toxic Exposure Surveillance System or TESS), annual toxic exposures to hydrocodone combination products exceeded those to oxycodone products from 2001 through 2011. For example, in 2011, there were 30,792 toxic exposures for hydrocodone combination products and 19,423 for oxycodone products. Majority of exposures were of intentional reason for both drugs. The rates (exposures per 100 kg of drug distributed or per 1 million U.S. population) of toxic exposures to hydrocodone (as bitartrate salt form) combination products were consistently higher than those to oxycodone (as hydrochloride salt form) products during 2001 through 2011.

The Trinity



Opiate







Benzodiazepine



Opiates v. Heroin

Circle of Addiction & the Next Generation

Oxycodone
Combinations
Percocet®
\$7-\$10/tab

Hydrocodone Lorcet® \$5-\$7/tab OxyContin® \$80/tab

Roxicodone®
Oxycodone IR
15mg, 30mg
\$30-\$40/tab

Heroin \$15/bag



1-888-589-3065

WWW.DAHCARSVOIKSWagen.com Call / Email Alex Pedram, General Sales Manag APedram@darcars.com







'Liaisons Dangereuses'New approach to classic P. 19



Playoff possibilities
Schedule favors Skins P. 35

Cooling down



POLITICS

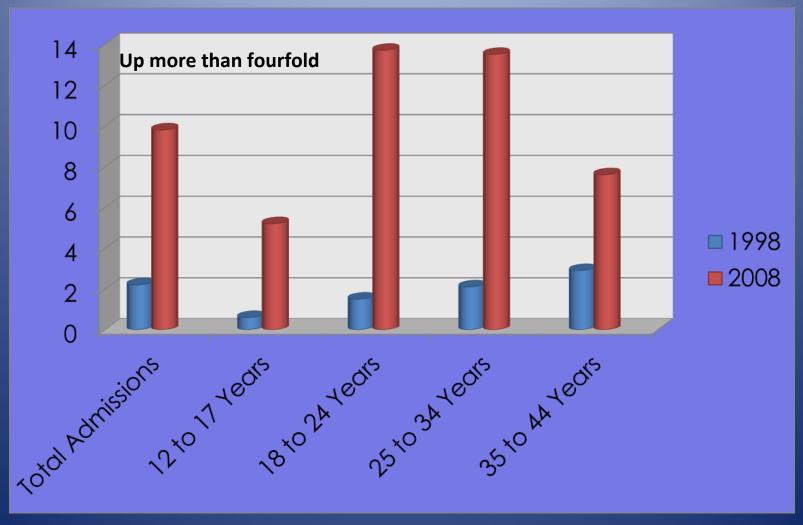
Stalemate on 'cliff' Sides stop talking; Obama's rate hikes may be flexible. P. 13

LOCAL

FRI analyst husted

Heroin use spikes in area suburbs Pill addicts risk deadly drug

Substance Abuse Treatment Admissions within Specific Age Groups That Reported Any Pain Reliever Abuse: 1998-2008



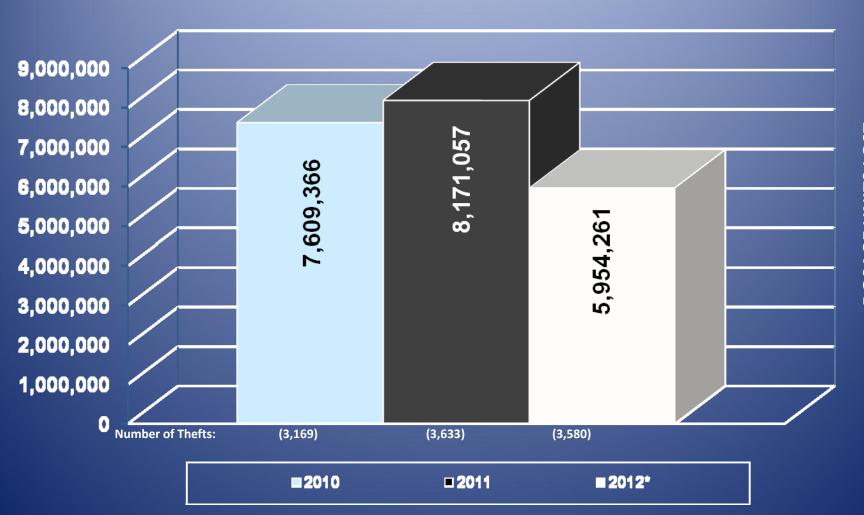
b. There is a significant diversion of the drug or other substance from legitimate drug channels; or

Diversion and Trafficking of Hydrocodone Combination Products

- Prescription Fraud
- Robberies and burglaries
- Internet Pharmacies
- Doctor Shopping
- Rogue Pain Clinics

DOSAGE UNITS LOST

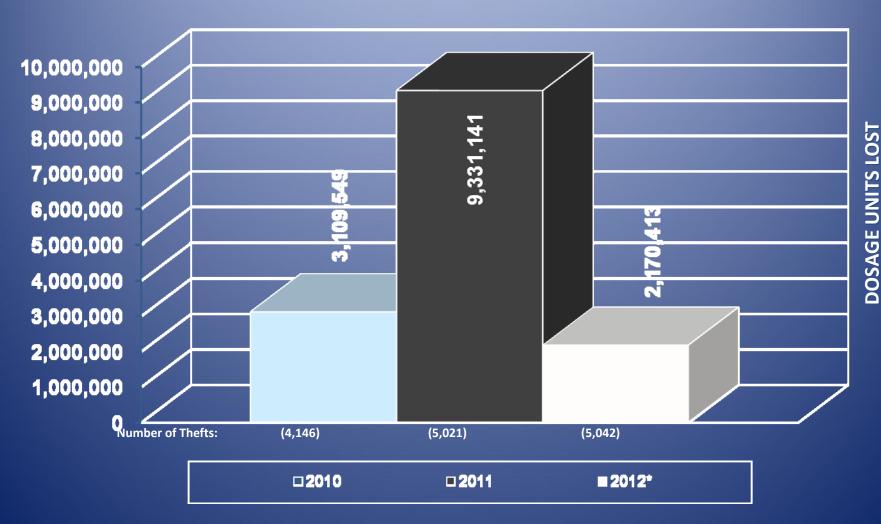
Comparisons of Hydrocodone Reported Thefts



* 01/01/2012 - 09/30/2012

Source: Drug Theft and Loss Date Prepared: 01/16/2013

Comparisons of Oxycodone Reported Thefts



* 01/01/2012 - 09/30/2012

Source: Drug Theft and Loss
Date Prepared: 01/16/2013

Violence Related to Controlled Substance Pharmaceuticals





Couple pleads guilty in pharmacy murders

Eyewitness News

MEDFORD (WABC) -- The suspect in the Father's Day massacre at a Long Island pharmacy pleaded guilty to murder charges Thursday. <u>David Laffer</u> has officially withdrawn his not guilty pleas to charges of first-degree murder and criminal use of a firearm and waived his right to appeal. Laffer killed four people at <u>Haven</u> <u>Drugs</u> in <u>Medford</u> before robbing the place of 10,000 hydrocodone pills.

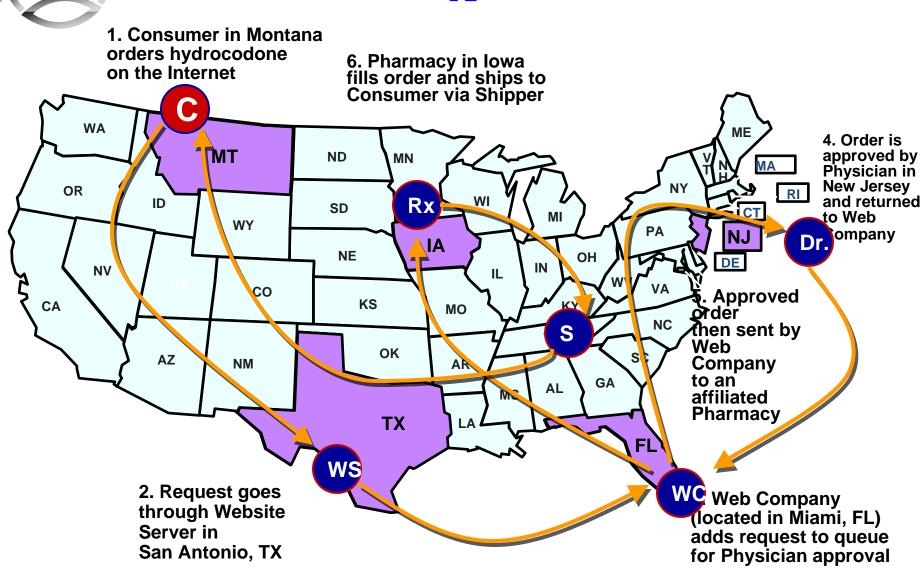
Laffer's wife, Melinda Brady, also pleaded guilty to robbery charges. The judge announced his intention to sentence Laffer to the maximum of four life sentences with no parole, to be served consecutively, and Brady to 21 to 25 years in state prison. Formal sentencing for both husband and wife is scheduled for October 17.

Laffer and Brady were arrested June 22 in their suburban home a mile and a half from Haven Drugs, where authorities say he opened fire on the victims before jamming the backpack full of prescription painkillers.



Diversion via the Internet

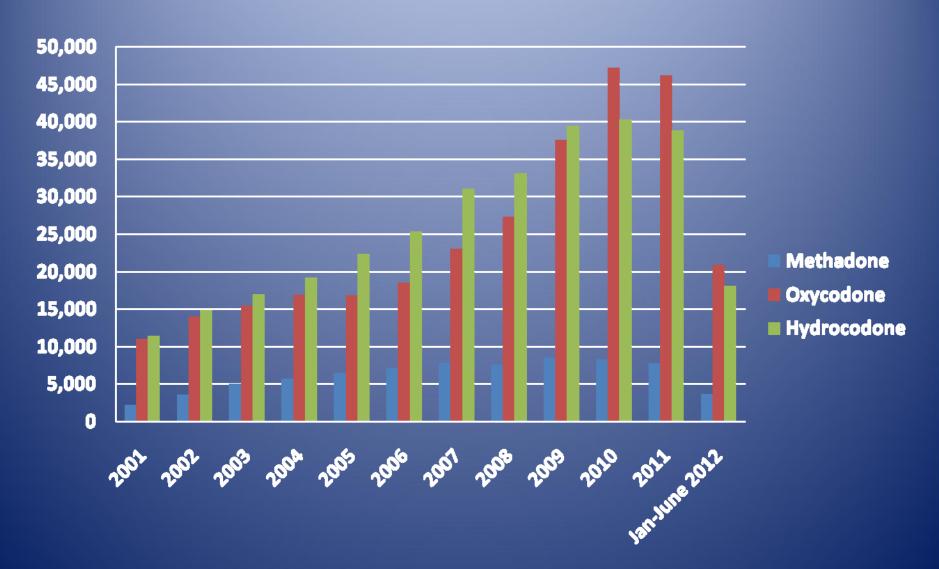
Domestic 'R_X' Flow



Purchases of hydrocodone by Known and Suspected Rogue Internet Pharmacies January 1, 2006 – December 31, 2006

1	Hillsborough TA	AMPA	FLORIDA	33614	15,596,380
2	Pinellas C	CLEARWATER	FLORIDA	33765	9,077.813
3	Hillsborough TA	AMPA	FLORIDA	33614	8,760,876
4	Baltimore City B.	BALTIMORE	MARYLAND	21213	5,876,300
5	Hillsborough TA	AMPA	FLORIDA	33619	5,718,200
6	Jefferson R	RIVER RIDGE	LOUISIANA	70123	4,892,900
7	Hillsborough TA	AMPA	FLORIDA	33634	4,733,290
8	Polk L/	AKELAND	FLORIDA	33813	4,564,480
9	Hillsborough TA	AMPA	FLORIDA	33612	4,220,840
10			FLORIDA	33759	3,819,320
11	Hillsborough TA		FLORIDA	33610	3,044,160
12			FLORIDA	33809	3,039,490
13		7 4 4		70123	2,750,000
14	UX 566	/		34652	2,664,120
15	98,566,7			33613	1,902,900
16		_		33801	1,726,020
17			FLORIDA	33612	1,619,765
18	· · · · · · · · · · · · · · · · · · ·		FLORIDA	33604	1,570,350
19				34689	1,464,900
20			NORTH CAROLINA	28037	1,402,450
21	5		FLORIDA	33617	1,282,800
22	· · · · · · · · · · · · · · · · · · ·		FLORIDA	33619	1,272,860
23			FLORIDA	33813	1,039,400
24			FLORIDA	33543	1,030,050
25			NORTH CAROLINA	28117	902,500
26			FLORIDA	33815	867,800
27			FLORIDA	33021	865,700
28	Los Angeles El	NCINO	CALIFORNIA	91436	798,100
29	<u> </u>		FLORIDA	33604	793,350
30			FLORIDA	34652	583,400
31			MONTANA	59833	362,000
32	•		FLORIDA	33619	162,000
33			FLORIDA	33441	112,600
34	Hillsborough TA	AMPA	FLORIDA	33614	49,600
					2,899,021
			Date Prepared:	03/07/2007 S	ource: ARCOS

National Forensic Laboratory Information System (NFLIS) U.S. Law Enforcement Cases



NFLIS Drug Cases

(State and Local Forensic Laboratories)

	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	Jan-June 2012
Methadone	2,145	3,508	4,986	5,594	6,409	7,053	7,778	7,500	8,459	8,173	7,658	3,613
Oxycodone	10,926	13,906	15,396	16,818	16,721	18,456	22,960	27,207	37,489	47,088	46,065	20,787
Hydrocodone	11,386	14,756	16,933	19,147	22,259	25,272	31,007	32,985	39,326	40,206	38,765	18,033
Morphine	1,725	2,180	2,687	2,801	3,171	3,637	4,337	4,757	5,986	5,986	6,931	3,696
Codeine	2,959	3,070	3,116	3,354	2,743	2,787	2,962	3,026	3,439	3,390	3,530	1,599
Meperidine	465	425	343	268	258	294	283	251	244	167	151	64

Yearly estimates published in NFLIS Annual Report (2001-2011) and NFLIS 2012 Midyear Report

NFLIS Data

Federal, State and Local Forensic Laboratory Cases:

	2006	2007	2008	2009	2010	2011	2012*
MEPERIDINE	342	332	339	274	268	159	94
OXYMORPHONE	17	47	139	387	868	3,045	2,086
CODEINE	2,978	3,059	3,478	3,629	3,646	3,398	2,455
HYDROMORPHONE	1,426	1,687	1,827	2,234	2,609	2,990	3,272
METHADONE	7,124	7,899	8,400	8,783	8,481	7,737	5,351
MORPHINE	4,036	4,685	5,731	7,104	7,440	7,768	6,657
HYDROCODONE	27,927	34,449	38,422	44,074	45,625	42,751	29,944
OXYCODONE	21,155	26,478	34,652	46,575	60,223	57,668	40,973

Federal, State and Local Forensic Laboratory Reports:

	2006	2007	2008	2009	2010	2011	2012*
MEPERIDINE	342	332	339	274	268	159	94
OXYMORPHONE	17	47	139	387	868	3,045	2,086
CODEINE	2,978	3,059	3,478	3,629	3,646	3,398	2,455
HYDROMORPHONE	1,426	1,687	1,827	2,234	2,609	2,990	3,272
METHADONE	7,124	7,899	8,400	8,783	8,481	7,737	5,351
MORPHINE	4,036	4,685	5,731	7,104	7,440	7,768	6,657
HYDROCODONE	27,927	34,449	38,422	44,074	45,625	42,751	29,944
OXYCODONE	21,155	26,478	34,652	46,575	60,223	57,668	40,973



Rogue Pain Clinics

Medical Care?

 Many of these clinics are prescription/dispensing mills.

Minimal practitioner/patient interaction



Drugs Prescribed

- A 'cocktail' of oxycodone and alprazolam (Xanax®)
- An average 'patient' receives prescriptions or medications in combination

Schedule II	Schedule III	Schedule IV
Oxycodone 15mg, 30mg	Vicodin (Hydrocodone)	Xanax (Alprazolam)
Roxicodone 15mg, 30mg	Lorcet	Valium (Diazepam)
Percocet	Lortab	
Percodan	Tylenol #3 (codeine)	
Demerol	Tylenol #4 (codeine)	
Methadone		

State Ranking* - Hydrocodone January 1 - December 31, 2011

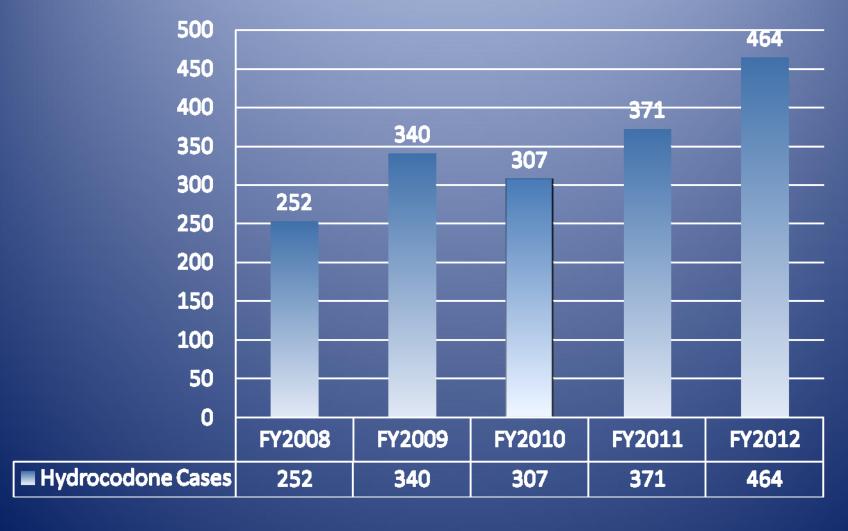
RANK	STATE	TOTAL	RANK	STATE	TOTAL	RANI	STATE	TOTAL	RANK	STATE	TOTAL	RANK	STATE	TOTAL
1	CA	405,692,065	12	IL	92,977,840	23	VA	55,100,651	34	СО	18,452,400	45	AK	6,041,200
2	TX	340,313,340	13	FL	90,012,630	24	WV	50,784,470	35	NM	17,284,770	46	WY	3,655,570
3	MI	172,654,340	14	NC	86,619,248	25	OR	49,989,655	36	NE	17,208,499	47	RI	3,571,380
4	AL	134,461,800	15	LA	82,584,490	26	WI	45,882,760	37	MA	15,920,820	48	VT	2,103,920
5	KY	129,026,114	16	MS	77,669,630	27	MN	32,918,294	38	MD	15,372,420	49	NH	1,740,840
6	TN	122,258,515	17	PA	76,070,466	28	UT	31,039,500	39	MT	11,065,910	50	PR	1274220
7	GA	111,364,050	18	IN	64,032,062	29	IA	29,605,860	40	SD	9,212,040	51	DE	823780
8	OK	102,103,000	19	AR	63,705,310	30	AZ	29,201,725	41	ND	9,067,980	52	DC	653,430
9	OH	94,175,600	20	WA	62,896,030	31	NJ	20,979,530	42	HI	8,500,500	53	VI	408,000
10	MO	93,914,780	21	KS	59,379,830	32	ID	20,976,760	43	СТ	8,372,250	54	GU	196,300
11	NY	93,900,590	22	SC	55,883,580	33	NE	20,409,240	44	ME	7,924,050			

^{*} Business Activity—Retail Pharmacies

Investigations

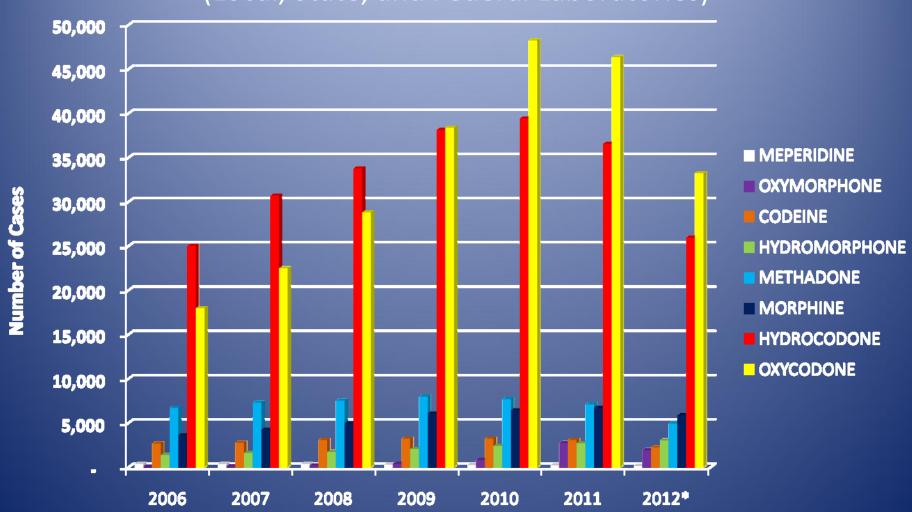
 May 2011 – Physician in private practice in Portsmouth and Chillicothe, Ohio, was convicted of 18 counts of illegal drug distribution, including 4 counts of distribution resulting in death. Physician prescribed and dispensed hydrocodone, oxycodone, alprazolam and diazepam from three locations. He received a life sentence for each of the four counts resulting in death.

Diversion Hydrocodone Cases* FY2008 thru 2012



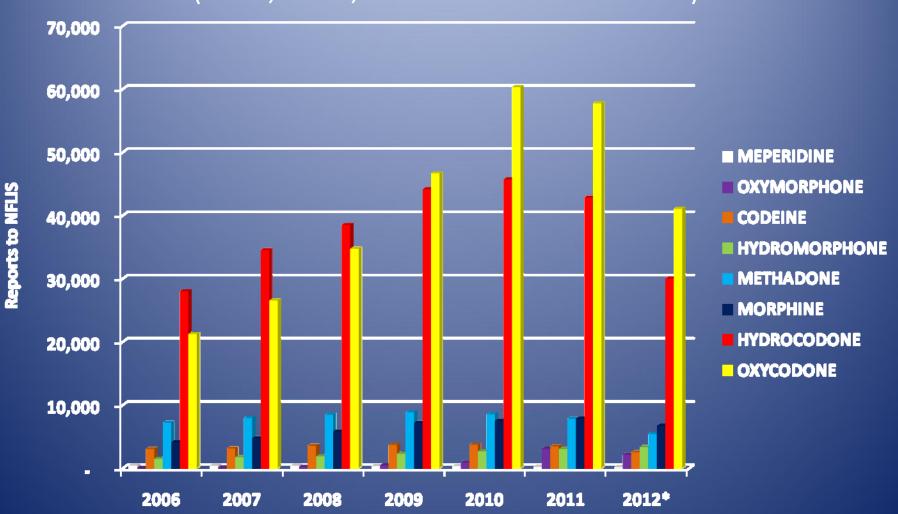
NFLIS Cases

(Local, State, and Federal Laboratories)



NFLIS Encounters

(Local, State, and Federal Laboratories)



Fact or Fiction?

"Hydrocodone combination products are less susceptible to abuse because they have an additional agent such as acetaminophen, aspirin, ibuprofen or homatropine"

"Hydrocodone products will be harder to obtain to treat pain if it is placed in schedule II"

"Burdens to pharmacies will increase (e.g. purchase larger safes, higher overhead costs, more paperwork etc.) if hydrocodone is placed in schedule II"

"Patient care will suffer. Patients will have to see a practitioner every month to get his/her prescription"

"Practitioners may not prescribe hydrocodone if it is placed in schedule II"

Schedule II

- The drug or other substance has a high potential for abuse
- The drug or other substance has a currently accepted medical use in treatment in the United States or a currently accepted medical use with severe restrictions
- Abuse of the drug or other substances may lead to severe psychological or physical dependence

Schedule III

- The drug or other substance has a potential for abuse less than the drugs or other substances in schedules I or II
- The drug or other substance has a currently accepted medical use in treatment in the United States
- Abuse of the drug or other substances may lead to moderate or low physical dependence or high psychological dependence



Questions



Thank You!